

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES  
PARCEL SELECT CONTRACT 34 (MC2019-188)  
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2019-211

**USPS MOTION TO EXTEND DEADLINE FOR QUARTERLY REPORTING**  
(November 25, 2019)

The United States Postal Service hereby moves to extend the deadline for its quarterly data reports in this docket, from thirty days to sixty days after the close of each quarter. As background, in Commission Order No. 5210 (issued August 26, 2019), the Postal Service was directed to report on contract-specific volumes, costs, and workhours on a quarterly basis within thirty (30) days of the close of each quarter. The Postal Service's first quarterly report for this contract was due on October 30, 2019, but was not filed until today, November 25, 2019, along with a motion for late acceptance. For the reasons discussed below, the Postal Service respectfully requests that the deadline be extended to sixty days after the close of each quarter for future reports.

There are a number of factors which cause significant challenges to the Postal Service in producing accurate and reliable quarterly data reports within thirty days after the close of each quarter.<sup>1</sup> Quarterly NSA data is processed as part of the Postal Service's quarterly filings of both Revenue, Pieces and Weight (RPW) and Billing Determinants. In particular, the RPW data typically are not finalized for at least forty (40) to sixty (60) days after the end of the quarter. Billing Determinants, which contain

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<sup>1</sup> In Docket No. CP2017-219, the Postal Service recently filed a similar motion for an extension of the quarterly reporting deadline to sixty days, which the Commission granted on November 15, 2019. The same factors that prompted the Postal Service's motion in Docket No. CP2017-219 apply in the instant docket.

the NSA customer-level detail, cannot be finalized until after the RPW data are produced. Additionally, in order to finalize the RPW and the Billing Determinants, data must be adjusted for postage adjustment factors and unmanifested pieces by each individual NSA customer. These adjustments are not at the rate-cell level, so the existing rate-cell data must be scaled to match the Billing Determinants, which is time consuming. Additional time is required for Postal Service personnel to reconcile and quality control the RPW and Billing Determinant data.

Furthermore, the compilation of NSA data is becoming increasingly more complicated. A new system, Package Platform, went live in January 2019 for scan-based payment returns. While there is a rigorous quality control in place to ensure accurate data, the implementation of a new system such as this creates issues that need to be resolved during the first year of implementation. The Postal Service's data systems will continue to evolve to support the contract terms that are being developed in this highly dynamic and increasingly competitive shipping services market. As the data systems evolve, manual adjustments must continually be made, which further increases the time and resources involved.

In most instances, quarterly data reports produced within thirty days of the close of each quarter must necessarily rely on preliminary data that may change significantly between what is in the report and what may be available after the RPW and Billing Determinant final data can be used. The main focus of the Postal Service's Finance Department after each quarter ends is to ensure that RPW and Billing Determinants are accurate and can be delivered to the Commission within their expected time frames. Adding special quarterly NSA data reports that must be produced within thirty days of

the close of each quarter creates a significant resource burden on those same personnel, and ultimately may not produce fully accurate data that would be available once final RPW and Billing Determinant data can be relied upon.

In conclusion, the Postal Service submits that sixty days after the close of each quarter is a more reasonable deadline for the Postal Service, and respectfully moves to extend the deadline from thirty to sixty days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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